

ORIGINAL

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D. C.

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JUN 17 2004

In the Matter of:)
)
 Amendment of Section 73.202(b))
 Table of Allotments)
 FM Broadcast Stations)
 (Clinton and Mayfield, Kentucky))

FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

MM Docket No. _____

RM- _____

To: Office of Secretary
 Attn: Chief, Audio Division
 Media Bureau

PETITION FOR RULEMAKING

Bristol Broadcasting Company, Inc. ("Bristol Broadcasting") ("Petitioner"), licensee of WLLE(FM) (FCC Facility ID # 56556), Channel 271C3, Clinton, Kentucky, and WQQR(FM) (FCC Facility ID # 71613), Channel 234C2, Mayfield, Kentucky, by its undersigned attorneys and pursuant to Section 1.401 and Section 1.420(i) of the Commission's rules, hereby petitions the Commission to amend the FM Table of Allotments, Section 73.202(b) of the Commission's rules to (a) move the allotment of Channel 234C2 from Mayfield to Clinton, Kentucky, and modify Station WQQR(FM)'s license accordingly; (b) to move the allotment of Channel 271C3 from Clinton to Mayfield, Kentucky, and (c) upgrade the allotment of Channel 271C3 to Channel 271C2 at Mayfield, and modify Station WLLE(FM)'s license accordingly.

<u>COMMUNITY</u>	<u>PRESENT</u>	<u>PROPOSED</u>
Clinton, Kentucky	271C3	234C2
Mayfield, Kentucky	234C2	271C2

There are compelling public interest justifications and ample Commission precedents for granting this rulemaking request, and, in support thereof, the following is shown.

BACKGROUND

In March, 2004, Bristol Broadcasting acquired WQQR(FM), WLLE(FM), and WLIE-FM from Forever Communications, Inc. See FCC File No. BALH-20031210AAM, BALH-20031210AAU, and BALH-20031210AAT. Soon thereafter, an engineering analysis was commenced to determine (a) if the shortspacing of 1.33

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kilometers that now exists between WQQR(FM) and WLIE-FM could be alleviated and (b) how each of the facilities could be maximized.

Pursuant to that analysis, Bristol determined that *swapping* the allotments at Clinton and Mayfield, Kentucky, one for the other, would result in a preferential arrangement of allotments by allowing WLLE(FM) to provide an improved broadcast service to the public.

ENGINEERING CONSIDERATIONS

The reference coordinates for the proposed allotment of Channel 271C2 at Mayfield, Kentucky, are:

36° 40' 36" North Latitude
88° 29' 29" West Longitude

With a site restriction of 14.8 kilometers to the east, there would be an area in which to choose a suitable antenna location while meeting the Commission's minimum distance separation and principal community coverage requirements (See Exhibit 2).

A channel spacing study of all the present and proposed allotments and assignments on Channel 271, adjacent channels, and IF channels, attached hereto as Exhibit 1, demonstrates that Channel 271C2 could be allotted at the reference coordinates consistent with all the minimum distance separation requirements of the Commission.

With a hypothetical 70 dBu contour distance of 32.6 kilometers for a Class C2 facility, it is clear that the proposed facility would provide adequate "city-grade" coverage to the entirety of Mayfield, Kentucky (See Exhibit 3). Exhibit 4 "*Principal City Radial Terrain Profile – Mayfield, Kentucky*" demonstrates that virtual *line-of-site* would exist from the antenna through the principal city and that there are no major obstructions in the intervening path from the proposed coordinates to the city of Mayfield.

The proposed maximized Class C2 facilities at Mayfield, Kentucky will provide a predicted 60 dBu (1.0 mV/m) signal to a population of approximately 243,370 persons in an area of approximately 8,554.69 square kilometers. The currently licensed facilities of WLLE(FM) serves approximately 117,044 persons in an area of approximately 4,795.80 square kilometers. Thus, the adoption of the instant Petition would increase the coverage area of WLLE(FM) by approximately 3,758.89 additional square kilometers and would provide service to an additional 126,326 persons (See "*Gain-Loss Analysis*").

The reference coordinates for the proposed allotment of Channel 234C2 at Clinton, Kentucky, are:

36° 45' 51" North Latitude
88° 39' 55" West Longitude

With a site restriction of 31 kilometers to the east, an area¹ exists which complies with the Commission's minimum distance separation and principal community coverage requirements for the allotment of Channel 234C2 at Clinton, Kentucky (See Exhibit 6).

A spacing study of all the allotments and assignments relevant to Channel 234 using the reference coordinates for the proposed allotment at Clinton, Kentucky, was completed and is attached hereto as Exhibit 5. This study shows that adequate spacing consistent with the minimum distance separation requirements of the Commission exists toward all present and proposed allotments and assignments except toward Station WLIE-FM (Channel 232A) (FCC Facility ID # 40647) at Golconda, Illinois.

CONTINGENCY

As is reflected in Exhibit 5, the allotment of Channel 234C2 at the proposed coordinates will require modification to the licensed facilities of WLIE-FM. The allotment of Channel 234C2 at the reference coordinates creates a spacing of 54.3 kilometers toward WLIE-FM while spacing of 55 kilometers is required for a Class C2 allotment relative to a second-adjacent Class A allotment. Consequently, the allotment of Channel 234C2 at the proposed coordinates would create a prohibited shortspacing of 0.7 kilometers to the authorized facilities of WLIE-FM. Bristol Broadcasting proposes to eliminate this shortspacing by relocating the WLIE-FM transmitter/antenna to the extent necessary to create adequate spacing pursuant to Section 73.207 for the allotment of Channel 234C2 at Clinton, Kentucky. Station WLIE-FM is licensed to Bristol Broadcasting Company, Inc., the instant Petitioner, and accordingly consent of a third-party to the relocation of the WLIE-FM transmitter is not required.

As shown on Exhibit 10, there is a large area with many potential sites for the relocation of the WLIE-FM transmitter. At this site, the WLIE-FM facilities would be in full compliance with minimum distance separation, comply with principal community coverage requirements of the Commission's rules and the shortspacing to the proposed allotment of channel 234C2 at Clinton, Kentucky would be eliminated. A large portion of the "Area To Locate" shown on Exhibit 10 is rural and sparsely populated, and the Petitioner believes that there would be no difficulty in acquiring a suitable site for the relocation of WLIE-FM. Should the Commission adopt the instant Petition, Bristol Broadcasting will promptly prepare and file an application seeking a construction permit to relocate the transmitter facilities of WLIE-FM to accommodate

¹ The Petitioner notes that a separate Petition for Rulemaking was filed with the Commission on July 30, 2003, by Charles Crawford ("Crawford") of Dallas, Texas, seeking to have Channel 235A allotted at Auxvasse, Missouri. As a prerequisite for the allotment of Channel 235A at Auxvasse, Station KSHE Channel 235C in Crestwood, Missouri, would need to be reclassified to a Class C0, and Crawford, as part of his petition, made a formal request pursuant to MM Docket 98-93 to have KSHE reclassified from a Class C to a Class C0. If KSHE is downgraded to a Class C0, an even larger area would exist for the allotment of Channel 234C2 at Clinton, Kentucky, as is proposed herein.

the spacing requirements relative to Station WQQR(FM) and upon the grant of a construction permit will work diligently to construct the new relocated facilities.

Using a maximized Class C2 hypothetical "city-grade" contour distance of 32.6 kilometers, maps (Exhibit 7) were prepared to show that a signal level of 70 dBu or greater will be provided over all of the principal community from the reference coordinates for the proposed allotment of Channel 234C2 at Clinton, Kentucky. The terrain along a radial drawn from the reference coordinates through the center of Clinton was charted and attached as Exhibit 8. This chart demonstrates that no major obstructions exist along the signal path.

The predicted 60 dBu (1 mV/m) signal contour of the currently licensed facilities of WQQR(FM) encompasses an area of approximately 6,679.24 square kilometers and serves a population of approximately 209,536 persons. The maximized WQQR(FM) facilities proposed hereby will provide a 60 dBu or greater signal to approximately 248,871 persons in an area of approximately 8,554.69 square kilometers. With the adoption and implementation of the instant proposal, WQQR(FM) would provide service to an additional area of approximately 1,875.45 kilometers and an added population of 39,335 persons (See "*Gain-Loss Analysis*").

GAIN-LOSS ANALYSIS

As implementation of the instant Petition will require relocating the transmitter sites of both WLLE(FM) and WQQR(FM), a population gain-loss analysis of the two transmitter moves was undertaken. As attached hereto, Exhibit 11 demonstrates that moving the allotment of Channel 271 from Clinton to Mayfield, Kentucky, and upgrading the allotment to a Class C2 facility would provide new service to a substantial area and population. The theoretical 60 dBu contour of a maximized Class C3 operating from the currently licensed transmitter site of WLLE(FM) would cover an area of approximately 4,795.80 square kilometers encompassing a population of 117,044 persons (2000 Census). From the reference coordinates of the proposed allotment of Channel 271C2 at Mayfield, Kentucky, a maximized Class C2 facility would provide a 60 dBu signal to an area of approximately 8,554.69 square kilometers and a population of 243,370 persons which represents a gain of 3,758.89 square kilometers and 126,326 persons. Moving the transmitter site would, however, produce areas of WLLE(FM) signal coverage loss and gain. The WLLE(FM) loss area has a population of 7,078 while the station's gain area has a population of 133,404 yielding a net gain of 126,326 persons.

The entirety of the loss area that would result from the proposed relocation of the WLLE(FM) transmitter site is *well-served* with at least five full-time aural services. The whole of the WLLE(FM) loss area is served by a 60 dBu (1.0 mV/m) or greater signal strength from at least the following five full-time FM broadcast stations:

WBEL-FM	Cairo, Illinois	88.5 mHz
WDDJ-FM	Paducah, Kentucky	96.9 mHz

WFGE-FM	Murray, Kentucky	103.7 mHz
WKYQ-FM	Paducah, Kentucky	93.9 mHz
WRIK-FM	Metropolis, Illinois	98.3 mHz

There are numerous other full-time FM and AM broadcast stations that provide service to all or part of the WLLE(FM) loss area with a signal strength of 60 dBu or greater. Therefore, the loss area created by relocating the WLLE(FM) transmitter site as proposed hereby is *well-served* as defined by the Commission. *See, FM Table of Allotments (Douglas, GA, et al.) 10 FCC Rcd 7706, 7707 (1995) (where loss area received service from at least five full-time reception services, the Commission found the area to be "well-served"). See also MM Docket 97-117 Wray and Otis Colorado, 13 FCC Rcd 2612 (1998).*

Relocating the WQQR(FM) transmitter site as proposed hereby would not create an area of *actual* signal loss because WQQR(FM) is currently licensed to operate with facilities less than the maximum for a Class C2 station. For that reason, and because the distance of the proposed move is very small, the theoretical 60 dBu contour of a maximized Class C2 facility operating from the proposed reference coordinates would fully encompass the current 60 dBu signal contour of WQQR(FM) (See Exhibit 12). However, for the purposes of this Petition a comparison was made between the theoretical signal contours of maximized Class C2 facilities operating at the currently licensed location of the WQQR(FM) transmitter and from the proposed reference coordinates for the allotment of Channel 234C2 at Clinton, Kentucky.

Relocating the WQQR(FM) transmitter site as proposed will result in a loss area and a gain area of equal size. The population in the loss area was calculated to be 914 persons (2000 U.S. Census) while the population in the gain area is 7,517 persons resulting in a net gain of 6,603 persons.

The entirety of the loss area created by the proposed relocating of the WQQR(FM) transmitter site is served by a 60 dBu (1.0 mV/m) or greater signal strength from at least the following five full-time FM broadcast stations:

WDDJ-FM	Paducah, Kentucky	96.9 mHz
WFGE-FM	Murray, Kentucky	103.7 mHz
WKMS-FM	Murray, Kentucky	91.3 mHz
WKYQ-FM	Paducah, Kentucky	93.9 mHz
WRIK-FM	Metropolis, Illinois	98.3 mHz

There are numerous other full-time FM and AM broadcast stations that provide all or part of the WQQR(FM) loss area with a signal strength of 60 dBu or greater. Therefore, the loss area created by relocating the WQQR(FM) transmitter site as proposed hereby should

be considered well-served. See, *FM Table of Allotments (Douglas, GA, et al.)* 10 FCC Rcd 7706, 7707 (1995) (where loss area received service from at least five full-time reception services, the Commission found the area to be "well-served"). See also *Wray and Otis Colorado*, 13 FCC Rcd 2612 (1998).

POPULATION GAIN-LOSS CHART

Population within the theoretical 60 dBu contours of facilities at the proposed locations
2000 CENSUS

<u>STATION</u>	<u>POPULATION GAIN</u>	<u>POPULATION LOSS</u>	<u>NET GAIN</u>
WLLE(FM) 271C2	133,404	7,078	126,326
WQQR(FM) 234C2	7,517	914	6,603
TOTALS	140,921	7,992	132,929

NOTE: The population gains and losses for WQQR(FM) were computed using the theoretical 60 dBu contour of a maximized Class C2 station. The population gain vis-à-vis the currently licensed facilities of WQQR(FM) is 39,336. The theoretical 60 dBu contour from the proposed reference coordinates would completely encompass the currently licensed 60 dBu contour of WQQR(FM), thus there would be no loss area (See Exhibit 12 *Channel 234C2 – Gain/Loss Areas*).

Listed on the accompanying chart ("*Population Gain-Loss Chart*") are the gains and losses in numbers of persons according to the 2000 U.S. Census Bureau's population figures for the areas of signal loss or gain for each of the stations involved in the proposed reallocation. It depicts a cumulative population loss of 7,992 persons and a cumulative gain of 140,921 persons. Therefore, the net gain of the instant Petition is 132,929 persons who would receive additional aural service(s).

MUTUALLY EXCLUSIVE WITH PRESENT ALLOTMENTS

The allotment of Channel 234C2 to Clinton, Kentucky, and Channel 271C2 to Mayfield, Kentucky, as proposed herein, is mutually exclusive with the present allotments of Channel 234C2 at Mayfield and Channel 271C3 at Clinton, respectively. Therefore, Bristol Broadcasting has filed this proposal for the reallocation of Station WQQR(FM) (Channel 234C2) from Mayfield to Clinton and the reallocation and upgrade of Station WLLE(FM) (Channel 271) from Clinton to Mayfield in accordance with the provisions of Section 1.420(i) of the Commission's Rules, which permits the modification of a station's license to specify a new community of license while not affording other parties the opportunity to file competing expressions of interest in the proposed allotment. See *Modification of FM and TV Authorizations to Specify a New Community of License ("Change of Community R&O")*, 4 FCC Rcd 4870 (1989), *recon. granted in part ("Change of Community MO&O")*, 5 FCC Rcd 7094 (1990).

NO MIGRATION TOWARD AN URBANIZED AREA

The Petitioner states that the reallocations hereby proposed should not give rise to the Commission's concerns with migration of stations from rural to urban areas,

because the instant proposal involves only *exchanging* the allotments of Mayfield and Clinton, Kentucky, one for the other. Neither the Mayfield nor Clinton allotment would be moved to an alternative community under this proposal, obviating the necessity of a *Tuck* analysis. See *Headland, Alabama, and Chattahoochee, Florida*, 10 FCC Rcd 10,352 (1995) and *Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988).

ONLY STATIONS OWNED BY THE PETITIONER ARE INVOLVED

The instant proposal seeking to amend the FM Table of Allotments, Section 73.202(b) only involves Stations WQQR(FM), WLLE(FM), and WLIE-FM ("minor change" transmitter relocation – no allotment change). All three stations affected by this proposal are owned by Bristol Broadcasting Company, Inc., the instant Petitioner. No other station would lose service or receive prohibited interference if the instant Petition were granted.

PETITIONER'S INTENTION TO APPLY

If the proposed amendments to the FM Table of Allotments are adopted by the Commission, the Petitioner intends, pursuant to the Rules of the Commission, to file applications for Construction Permits to avail itself of the facilities proposed hereby. Applications for Construction Permits (FCC Form 301) will be filed to move the transmitter/antenna sites and change the operating parameters of Stations WQQR(FM) and WLLE(FM) in accord with the instant proposal. If awarded the permits, the Petitioner pledges to promptly construct the proposed facilities. The Petitioner has both the experience and financial qualifications to construct and operate the facilities sought.

PROPOSAL IS DESERVING OF APPROVAL

In sum, the instant proposal is deserving of approval as it will not deprive any community of an existing allotment and will result in a preferential arrangement of allotments by allowing WLLE(FM) to upgrade and provide an improved broadcast service to the public. An independent public interest benefit flowing from full implementation of the instant proposal is that the shortspacing that now exists between Stations WQQR(FM) and WLIE-FM, would be removed allowing WQQR(FM) to provide a greater signal strength to the public.

SUMMARY

A grant of this Petition would be consistent with the Commission's policies and rules and would be in the public interest for the following reasons:

1. Channel 234C2 at Clinton, Kentucky is mutually exclusive with Channel 234C2 at Mayfield, Kentucky.
2. Channel 271C2 at Mayfield, Kentucky is mutually exclusive with Channel 271C3 at Clinton, Kentucky.

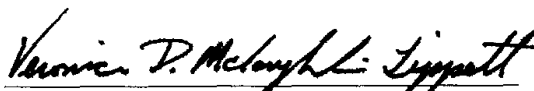
3. The proposed *exchange* of the allotment of Channel 234 at Mayfield and the allotment of Channel 271 at Clinton, one for the other, will allow adequate spacing for Station WLLE(FM) to upgrade from Class C3 to Class C2.
4. Upon adoption and implementation of the instant Petition 132,929 persons (net gain) would receive additional aural service(s).
5. All signal loss areas resulting from relocating WQQR(FM) and WLLE(FM) as proposed hereby are *well-served* by more than five full-time aural services.
6. The proposed reallocations should not give rise to the Commission's concerns with migration of stations from rural to urban areas since the reallocations proposed hereby do not include any *new* communities of license.
7. All of the Commission's mileage and distance separation requirements (Section 73.207) have been addressed and this proposal can be accommodated without jeopardizing any other present or proposed facility.
8. This Petition affects only three stations all of which are owned by the Petitioner, thus no *third-party* licensee would be involved.
9. Each of the three stations affected would, upon adoption and implementation of the instant Petition, be in full compliance with the Commission's principal community coverage requirements (Section 73.315).
10. The amendments of the Table of Allotments as requested by this petition, if granted, would provide for efficient utilization of the FM Broadcast spectrum.
11. This Petition is consistent with *Modification of FM and TV Authorizations to Specify a New Community of License* ("Change of Community R&O"), 4 FCC Rcd 4870 (1989), recon. granted in part ("Change of Community MO&O"), 5 FCC Rcd 7094 (1990).
12. The Petitioner intends to apply for the proposed facilities, if adopted, and if awarded Construction Permits, to promptly construct and operate the facilities.

CONCLUSION

WHEREFORE, in view of the foregoing facts, Bristol Broadcasting Company, Inc. ("Petitioner"), requests that the Table of Allotments FM Broadcast Stations, Section 73.202(b) be amended to (a) move the allotment of Channel 234C2 from Mayfield to Clinton, Kentucky, and modify Station WQQR(FM)'s license accordingly, (b) to move the allotment of Channel 271C3 from Clinton to Mayfield, Kentucky, and (c) upgrade the allotment of Channel 271 at Mayfield from Class C3 to Class C2, and modify Station WLLE(FM)'s license accordingly.

Respectfully submitted,

Bristol Broadcasting Company, Inc.

By: 
Clifford M. Harrington
Veronica D. McLaughlin Tippet

Shaw Pittman LLP
2300 N Street, N.W.
Washington, DC 20037
(202) 663-8000

Dated: June 17, 2004

JOHN J. MULLANEY
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ALAN E. GEARING, P.E.
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MULLANEY ENGINEERING, INC.
9049 SHADY GROVE COURT
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Independent Review of Rulemaking Petition Involving WLLE & WQQR

At the request of Bristol Broadcasting Company, Inc., an independent review was conducted by John J. Mullaney of Mullaney Engineering, Inc, of the channel changes being proposed. It was determined that the sites being proposed are properly spaced, provide the requisite city grade coverage and all of the sites have line of sight coverage into their respective city of license. No underserved area is created and the proposed changes result in service gain to more than 132,000 persons.

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

/s/ John J. Mullaney

John J. Mullaney

Executed on the 11th day of June 2004.

Petition for Rulemaking
Bristol Broadcasting Company, Inc.
 Clinton and Mayfield, Kentucky

Exhibit 1

Channel Spacing Study – Channel 271C2 – Mayfield, Kentucky

PARAMETERS

Channel 271C2

36° 40' 36" North Latitude

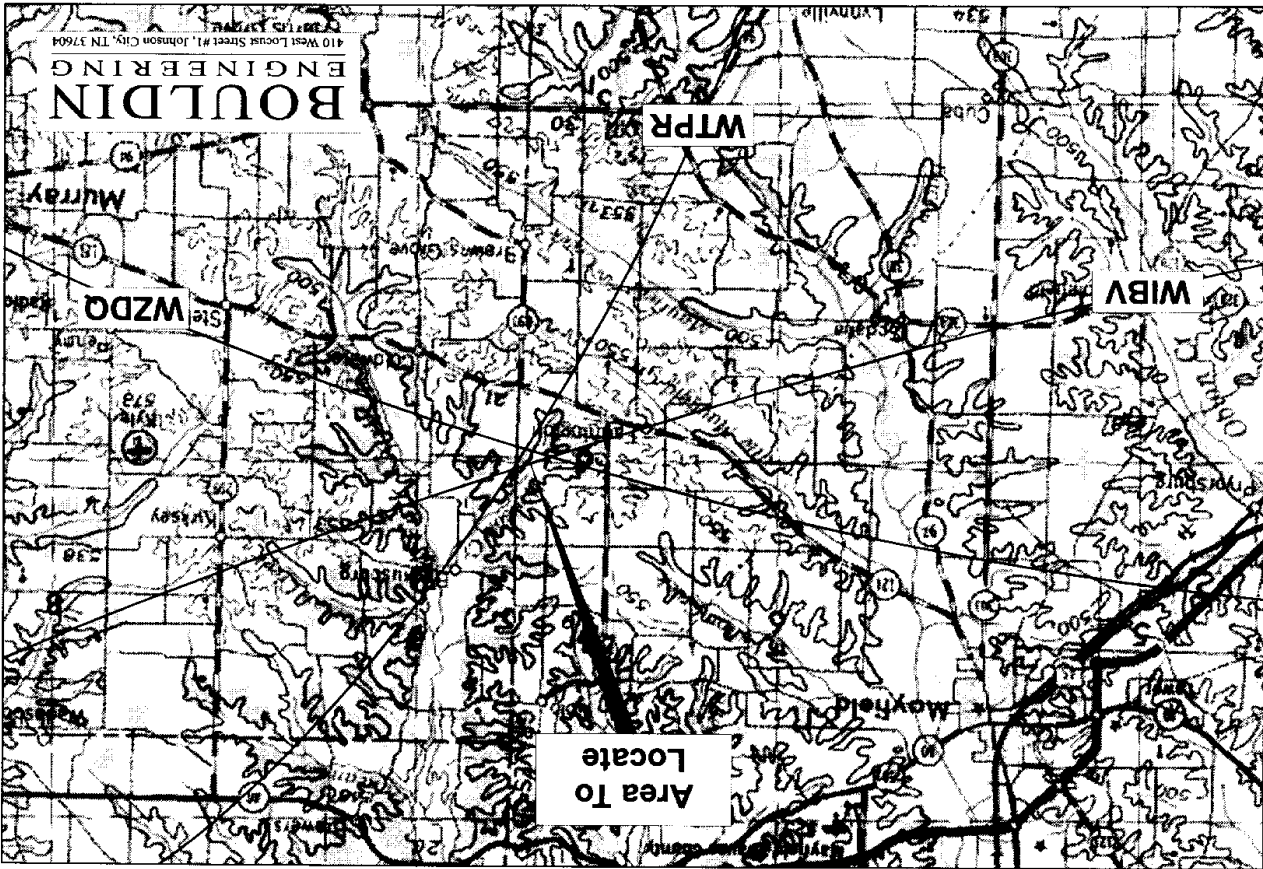
88° 29' 29" West Longitude

<u>Station</u>	<u>Location</u>	<u>Channel</u>	<u>Class</u>	<u>Bearing</u>	<u>Distance</u>	<u>Required</u>	<u>Margin</u>	<u>OK/Short</u>
KIYS	Jonesboro	270	C	248.5	213.51	188	25.51	OK
WIBV	Mount Vernon	271	B1	343.7	199.77	200	-.23	OK
	Okawville	271	B1	338.3	202.24	200	2.24	OK
WEBQ	Eldorado	272	A	1.5	126.99	106	20.99	OK
WQXQ	Central City	270	C1	52.4	167.06	158	9.06	OK
WLLE	Clinton	271	C3	284.9	27.31	177	-149.69	Short
WMJL	Marion	274	A	27.0	82.5	55	27.5	OK
WKMS	Murray	217	C1	52.1	44.48	40	4.48	OK
KDEX	Dexter	272	A	276.1	127.13	106	21.13	OK
KDEX	Dexter	272	C2	278.3	146.82	130	16.82	OK
WZDQ	Humboldt	272	A	198.2	106.76	106	.76	OK
WCMT	Martin	269	A	222.6	47.35	55	-7.65	Short ¹
WTPR	McKinnon	268	A	122.2	55.35	55	.35	OK

A study of all the present and proposed allotments and assignments on Channel 271, on the three immediately upper adjacent channels, the three immediately lower adjacent channels, and on the two IF channels removed 10.8 mHz and 10.6 mHz respectively from 102.1 mHz (Channel 271) was made using the spacing criteria given in 47 C.F.R. Section 73.207 of the FCC Rules. The results of that study are shown above. For the sake of simplicity, only allotments or assignments that had a spacing margin less than 30 kilometers was shown on the chart above.

¹The allotment of Channel 269A at Martin, Tennessee, has been deleted in favor of the allotment of Channel 267C3 at South Fulton, Tennessee (See RM 9619 – Docket 99-196). A Construction Permit (FCC File Number BPH-20021213AAU) has been granted for the relocation of the WCMT transmitter from Martin to South Fulton.

Petition for Rulemaking
Bristol Broadcasting Company, Inc.
Clinton and Mayfield, Kentucky
Exhibit 2
Area To Locate - Channel 27.1C2 - Mayfield, Kentucky

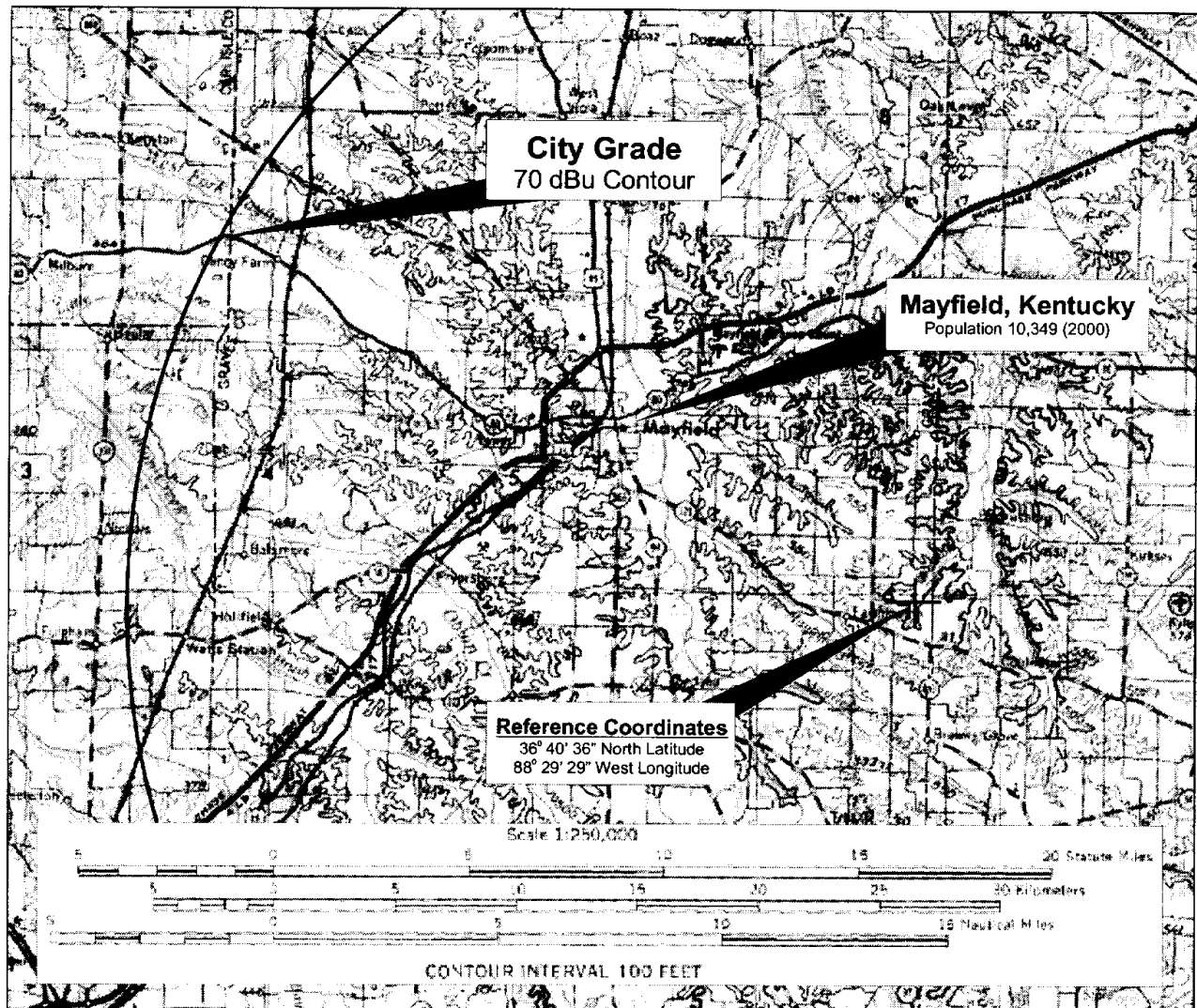


This exhibit was prepared to show the area available for locating the transmitter facility for Channel 27.1C2 in which adequate spacing exist consistent with the Commission's Rules. For clarity only the stations that define the area to locate are shown on this chart.

Area To Locate

Petition for Rulemaking
Bristol Broadcasting Company, Inc.
Clinton and Mayfield, Kentucky
Exhibit 3

Principal City Contour - Proposed Channel 271C2 at Mayfield, Kentucky



Principal City Contour

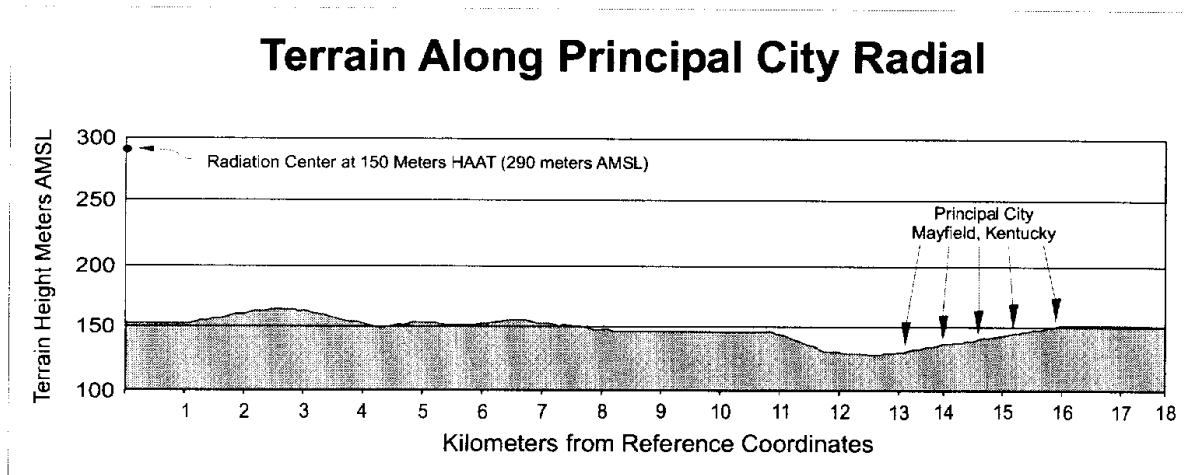
This exhibit was prepared to show the hypothetical *principal city* (70 dBu) contour for a maximized Class C2 facility operating from the reference coordinates at Mayfield, Kentucky. Clearly, the 70 dBu contour extends well beyond the corporate limits of Mayfield, Kentucky.

BOULDIN
ENGINEERING
410 West Locust Street #1, Johnson City, TN 37604

Petition for Rulemaking
Bristol Broadcasting Company, Inc.
Clinton and Mayfield, Kentucky

Exhibit 4

Principal City Radial Terrain Graph - Channel 271C2 - Mayfield, Kentucky



Principal City Terrain Profile

Terrain elevations along a radial drawn from the reference coordinates (36° 40' 36" N - 88° 29' 29" W) for the allotment of Channel 271C2 through Mayfield, Kentucky, the proposed city of license, were taken and plotted on the graph above. It is clear that no major terrain obstacles exist between the reference location and the principal city.

Petition for Rulemaking
Bristol Broadcasting Company, Inc.
 Clinton and Mayfield, Kentucky

Exhibit 5

Channel Spacing Study – Channel 234C2 – Clinton, Kentucky

PARAMETERS

Channel 234C2

36° 45' 51" North Latitude

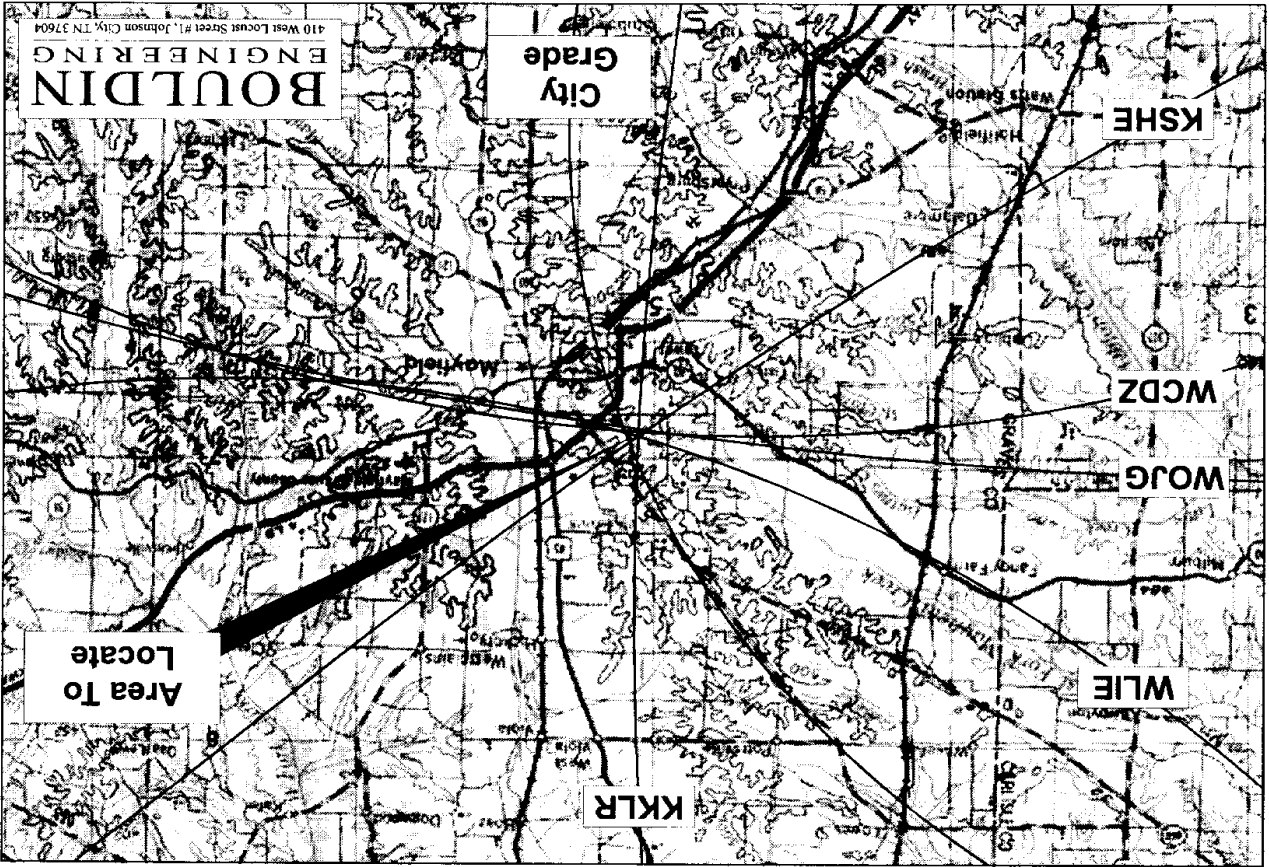
88° 39' 55" West Longitude

<u>Station</u>	<u>Location</u>	<u>Channel</u>	<u>Class</u>	<u>Bearing</u>	<u>Distance</u>	<u>Required</u>	<u>Margin</u>	<u>OK/Short</u>
WLIE	Golconda	232	A	15.9	54.3	55	-.7	Short ¹
WYNG	Mount Carmel	235	B	22.8	197.3	169	28.3	OK
WQQR	Mayfield	234	C2	82.4	1.63	190	-188.37	Short
WBIO	Philpot	234	A	54.5	181.1	166	15.1	OK
	Smith Mills	233	A	29.7	131.56	105	25.56	OK
KSHE	Crestwood	234	C	324.5	248.52	249	-.48	OK
KKLR	Poplar Bluff	233	C1	270.5	157.94	158	-.06	OK
WOJG	Bolivar	234	A	188.2	166.65	166	.65	OK
WCDZ	Dresden	236	A	180.2	55.51	55	.51	OK
WCDZ	Dresden	236	C3	180.2	55.51	56	-.49	OK
WLSQ	Dyer	232	A	209.6	84.31	55	29.31	OK
WFGZ	Lobelville	233	C2	145.8	133.81	130	3.81	OK
WLZK	Paris	231	C3	146.3	60.09	56	4.09	OK
WKVZ	Ripley	235	A	214.7	128.12	106	22.12	OK

A study of all the present and proposed allotments and assignments on Channel 271, on the three immediately upper adjacent channels, the three immediately lower adjacent channels, and on the two IF channels removed 10.8 mHz and 10.6 mHz respectively from 94.7 mHz (Channel 234) was made using the spacing criteria given in 47 C.F.R. Section 73.207 of the FCC Rules. The results of that study are shown above. For the sake of simplicity, only allotments or assignments that had a spacing margin less than 30 kilometers was shown on the chart above.

¹Station WLIE is owned by Bristol Broadcasting Company, Inc., (the "Petitioner") and, upon adoption of the instant Petition by the Commission, will be relocated to a site that will provide adequate spacing to allow for the allotment of Channel 234C2 at Clinton, Kentucky, as proposed hereby.

Petition for Rulemaking
Bristol Broadcasting Company, Inc.
Clinton and Mayfield, Kentucky
Exhibit 6
Area To Locate - Channel 234C2 - Clinton, Kentucky



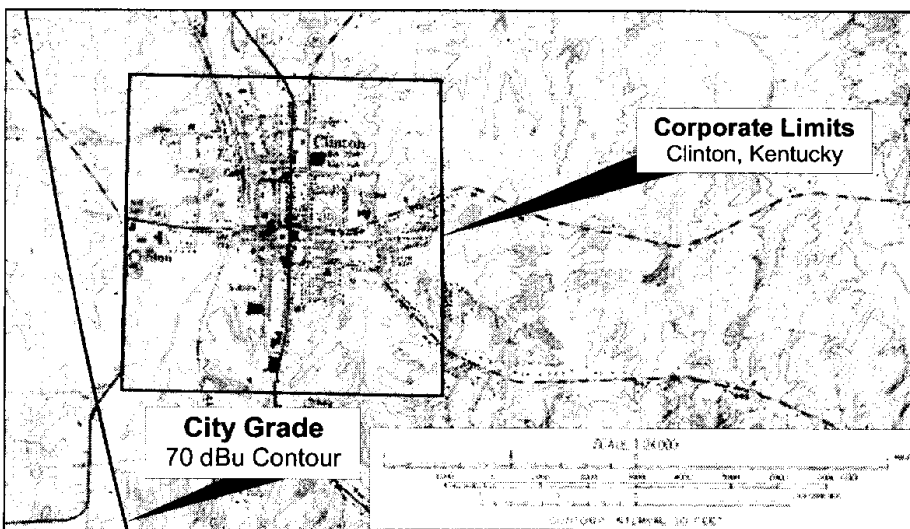
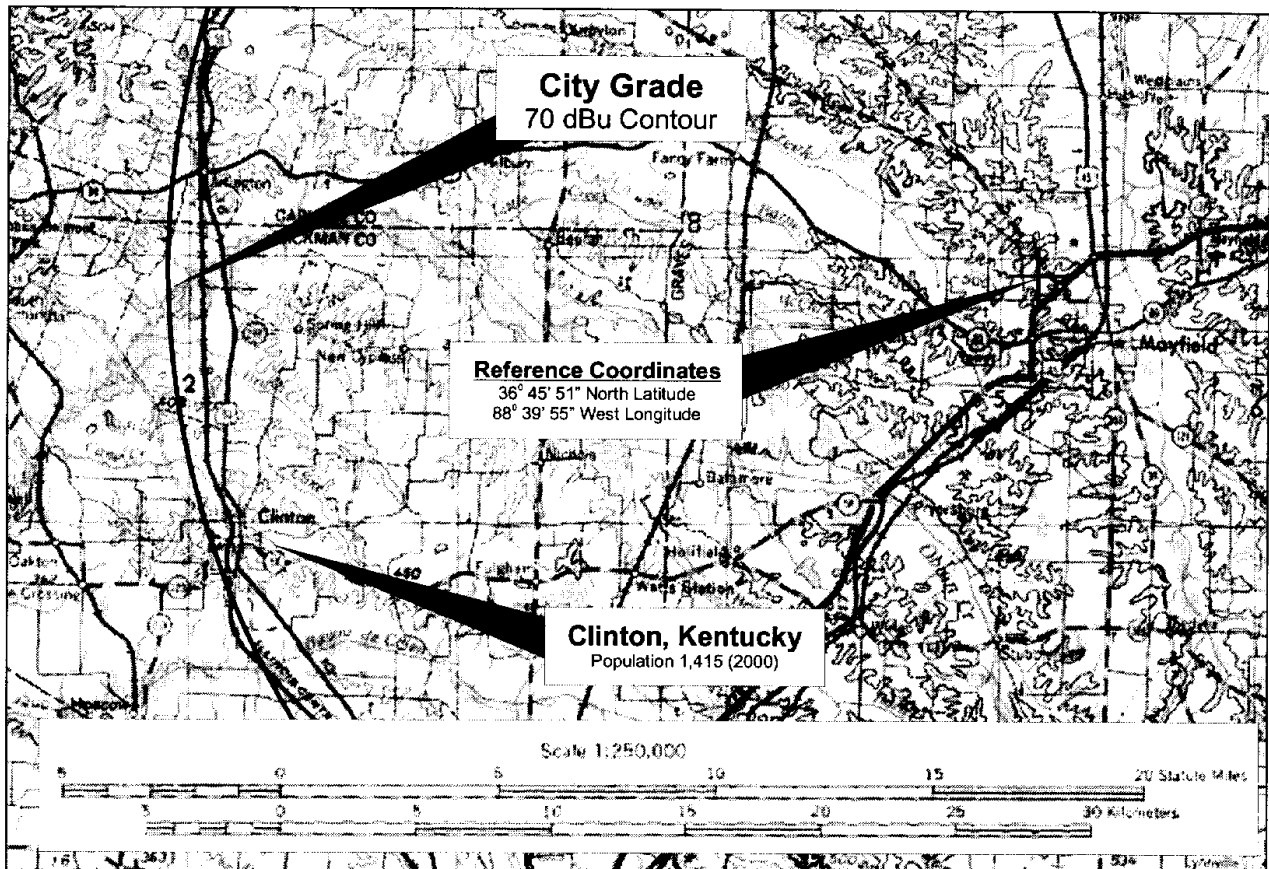
Area To Locate

This exhibit was prepared to show the area available for locating the transmitter facility for Channel 234C2 in which adequate spacing exist consistent with the Commission's Rules. It is noted that Station WLIE(FM) at Golconda, Illinois, was plotted from a location (Coordinates 37° 14' 10" N - 88° 29' 42" W) to which the facilities could be moved to provide sufficient spacing for the allotment of Channel 234C2 at the reference coordinates provided by the instant Petition. For clarity only the stations that define the area to locate are shown on this chart.

Petition for Rulemaking
Bristol Broadcasting Company, Inc.
Clinton and Mayfield, Kentucky

Exhibit 7

Principal City Contour - Proposed Channel 234C2 at Clinton, Kentucky



Principal City Contour

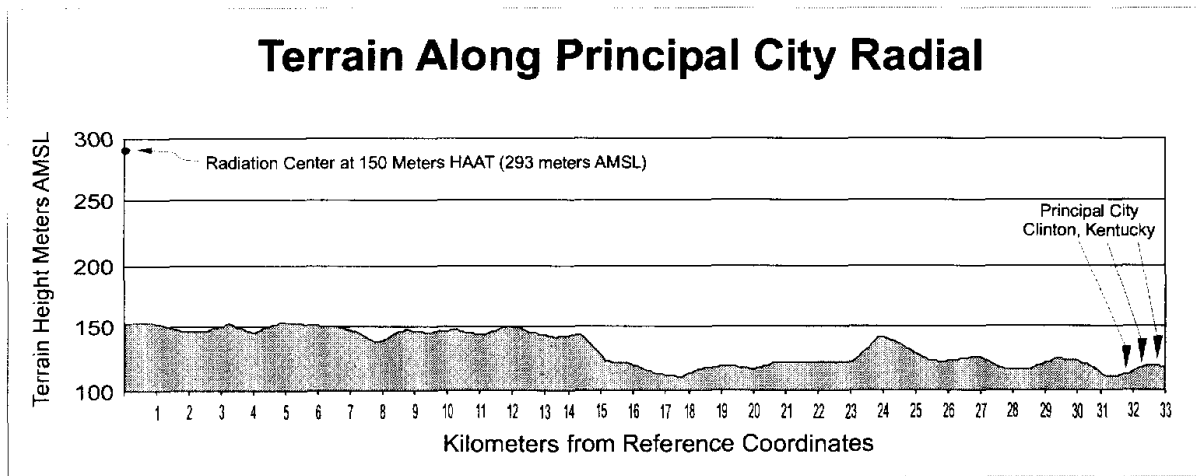
This exhibit was prepared to show the hypothetical *principal city* (70 dBu) contour for a maximized Class C2 facility operating from the reference coordinates at Clinton, Kentucky. The enlarged chart shows greater detail and clarity. Clearly, the 70 dBu contour encompasses the entirety of the corporate limits of Clinton, Kentucky.

**BOULDIN
ENGINEERING**
410 West Locust Street #1, Johnson City, TN 37604

Petition for Rulemaking
Bristol Broadcasting Company, Inc.
Clinton and Mayfield, Kentucky

Exhibit 8

Principal City Radial Terrain Graph - Channel 234C2 - Clinton, Kentucky



Principal City Terrain Profile

Terrain elevations along a radial drawn from the reference coordinates (36° 45' 51" N - 88° 39' 55" W) for the allotment of Channel 234C2 through Clinton, Kentucky, the proposed city of license, were taken and plotted on the graph above. It is clear that no major terrain obstacles exist between the reference location and the principal city.

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Exhibit 9

Channel Spacing Study – WLIE-FM – Channel 232A – Golconda, Illinois

PARAMETERS

Channel 232A

37° 14' 10" North Latitude

88° 29' 42" West Longitude

<u>Station</u>	<u>Location</u>	<u>Channel</u>	<u>Class</u>	<u>Bearing</u>	<u>Distance</u>	<u>Required</u>	<u>Margin</u>	<u>OK/Short</u>
WQQR	Clinton	234	C2	196.1	54.52	55	-.48	OK ¹
WMIX	Mount Vernon	231	B	343.6	131.41	113	18.41	OK
WQQR	Mayfield	234	C2	194.5	53.89	55	-1.11	Short ²
WEGI	Oak Grove	232	A	124.7	115.33	115	.33	OK
WLSQ	Dyer	232	A	204.4	137.9	115	22.9	OK
WLZK	Paris	231	C3	170.0	103.92	89	14.92	OK

A study of all the present and proposed allotments and assignments on Channel 271, on the three immediately upper adjacent channels, the three immediately lower adjacent channels, and on the two IF channels removed 10.8 mHz and 10.6 mHz respectively from 94.3 mHz (Channel 232) was made using the spacing criteria given in 47 C.F.R. Section 73.207 of the FCC Rules. The results of that study are shown above. For the sake of simplicity, only allotments or assignments that had a spacing margin less than 30 kilometers was shown on the chart above.

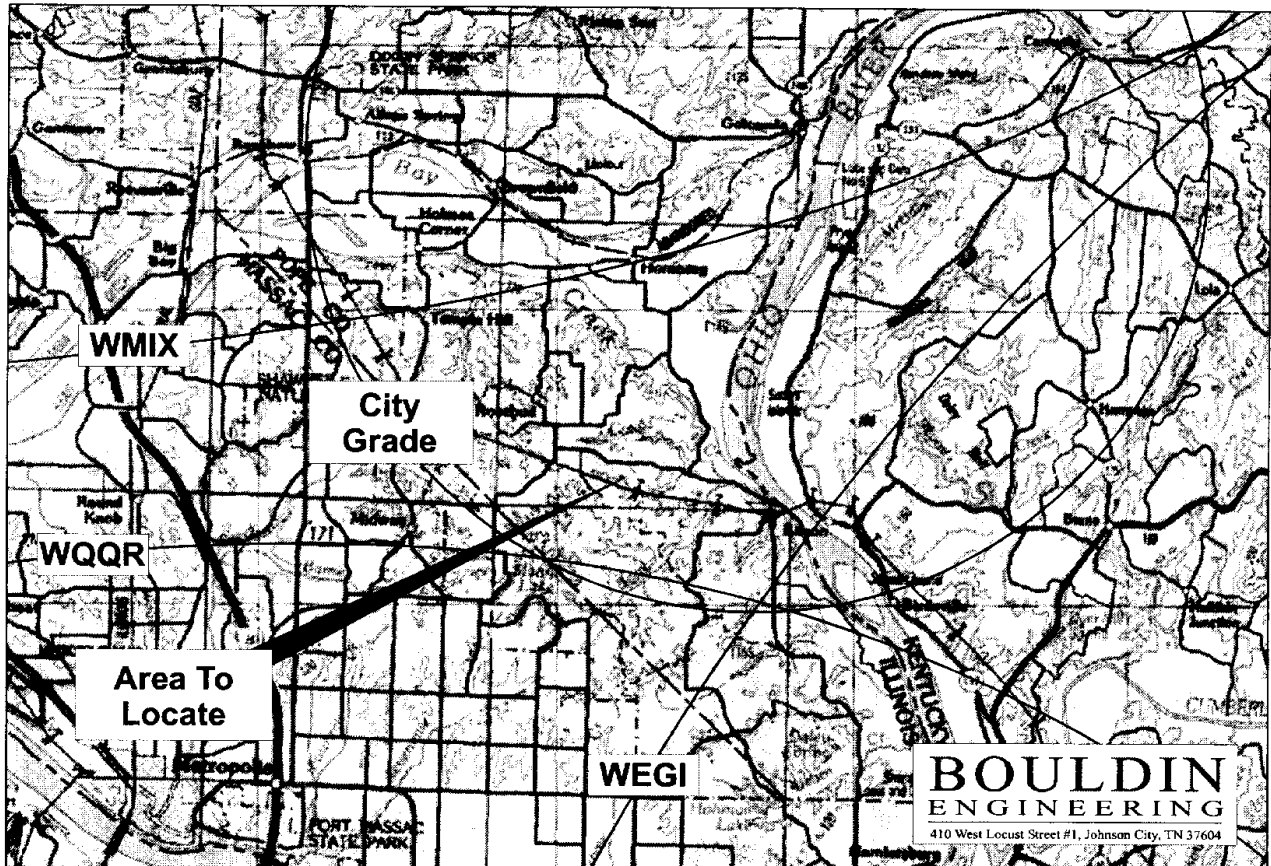
¹WQQR at the reference coordinates for the allotment of Channel 234C2 at Clinton, Kentucky as proposed by the instant Petition.

²WQQR at the currently licensed location.

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Exhibit 10

Area To Relocate - WLIE(FM) - Channel 232A - Golconda, Illinois



Area To Relocate

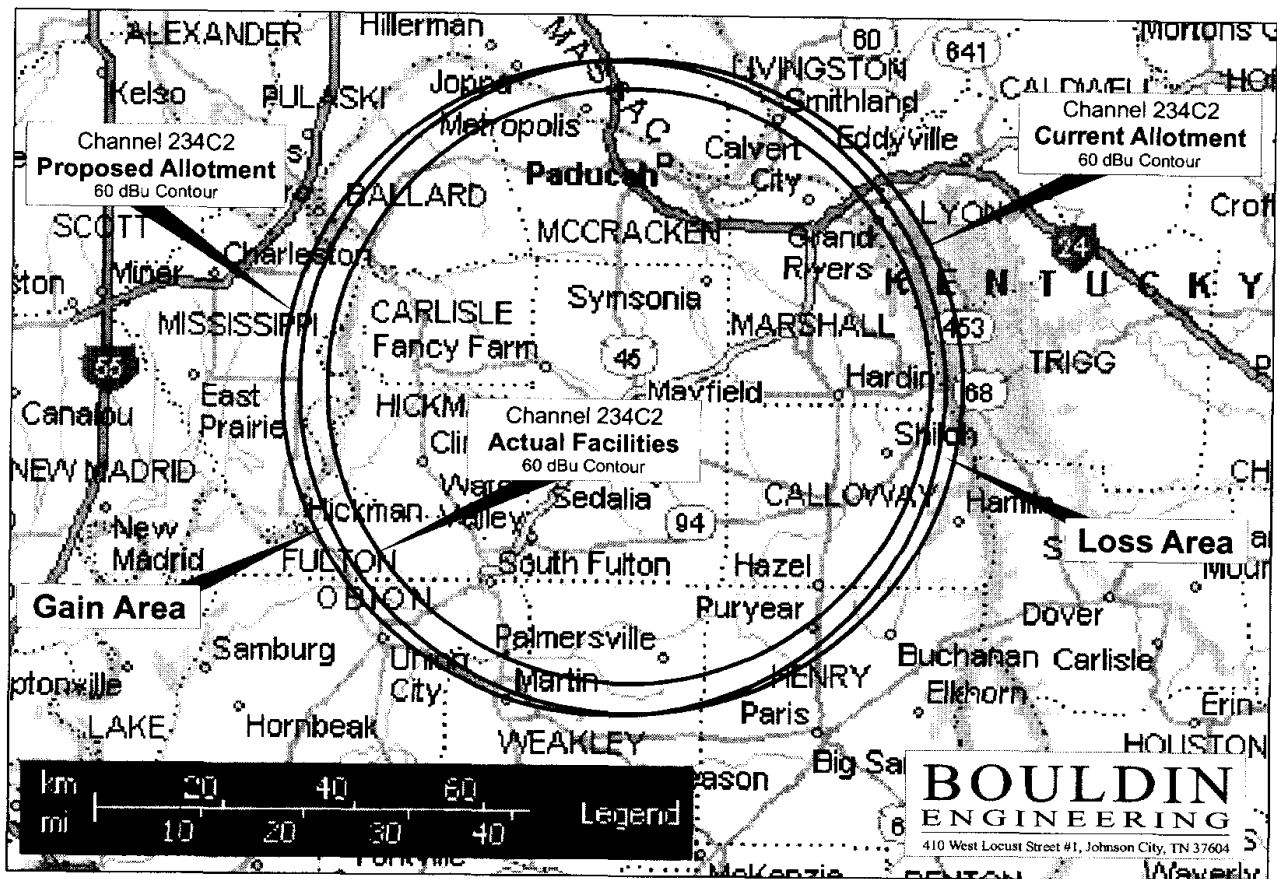
This exhibit was prepared to show the area available for relocating the transmitter facility for WLIE(FM) at Golconda, Illinois in which adequate spacing exist consistent with the Commission's Rules. It is noted that Station WQQR(FM) was plotted at the reference coordinates provided by the instant Petition for the allotment of Channel 234C2 at Clinton, Kentucky. For clarity only the stations that define the area to locate are shown on this chart.

Channel 271C2- Mayfield - Gain/Loss Areas



This exhibit shows the hypothetical 60 dBu contours for the current allotment of Channel 271C3 at Clinton, Kentucky, and for the proposed allotment of Channel 271C2 at Mayfield, Kentucky. The proposed reallocation and upgrade of Channel 271 from Clinton to Mayfield will produce a large area of coverage gain while creating a relative small area of coverage loss.

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 Clinton and Mayfield, Kentucky
Exhibit 12
Channel 234C2 - Gain/Loss Areas



Channel 234 Gain/Loss Showing

This exhibit shows the hypothetical 60 dBu contours for the current allotment of Channel 234C2 at Mayfield, Kentucky; for the proposed allotment of Channel 234C2 at Clinton, Kentucky; and for the currently licensed facilities of WQQR(FM) at Mayfield. The proposed reallocation of Channel 234C2 from Mayfield to Clinton, Kentucky, would produce very small virtually equal gain and loss areas.